

NO. X06-UWY-CV-18-6046436-S : SUPERIOR COURT
ERICA LAFFERTY, ET AL. : COMPLEX LITIGATION DOCKET
V. : AT WATERBURY
ALEX EMRIC JONES, ET AL. : JULY 13, 2022

NO. X06-UWY-CV-18-6046437-S : SUPERIOR COURT
WILLIAM SHERLACH : COMPLEX LITIGATION DOCKET
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JOINT TRIAL MANAGEMENT REPORT

Pursuant to the Court's Trial Management Order¹, the parties respectfully submit this Joint Trial Management Report.

I. CONTACT INFORMATION FOR TRIAL COUNSEL

PLAINTIFFS' RESPONSE:

Below please find the contact information for plaintiffs' trial counsel:

Alinor C. Sterling, Esq. (asterling@koskoff.com)
Christopher M. Mattei, Esq. (cmattei@koskoff.com)
Joshua D. Koskoff, Esq. (jkoskoff@koskoff.com)
Matthew S. Blumenthal, Esq. (mblumenthal@koskoff.com)

¹ See DN 836.00 (June 7, 2022) and the Court's subsequent order at DN 861.00 (June 30, 2022).

Sarah Steinfeld, Esq. (ssteinfeld@koskoff.com)
Colin S. Antaya, Esq. (cantaya@koskoff.com)
Koskoff, Koskoff, & Bieder, P.C.
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DEFENDANTS' RESPONSE:

Below please find the contact information for the Jones defendants' trial counsel:

Andino Reynal, 917 Franklin St., Sixth Floor, Houston, TX 7702 (PHV pending); 713.228.5900;
areynal@frlaw.com.

Kevin Smith, 383 Orange St., New Haven, CT 06511; 203.393.3017;
ksmith@pattisandsmith.com.

Norm Pattis, 383 Orange St., New Haven, CT 06511; 203.393.3017;
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Christopher DeMatteo, 383 Orange St., New Haven, CT 06511; 203.393.3017;
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II. JOINT NON-ARGUMENTATIVE DESCRIPTION OF THE CASE

After the Sandy Hook shooting happened, Alex Jones and his company, Free Speech Systems, stated that the Sandy Hook shooting was a hoax, that no one died at Sandy Hook, and that the families of the victims were crisis actors. Mr. Jones' business put these statements out to his audience through the Infowars family of websites, through Mr. Jones's nationally aired radio broadcasts, and through social media. The plaintiffs, surviving family members of children and educators killed at Sandy Hook and one first responder, claim that these statements and actions were intentional, reprehensible and outrageous and that they were profoundly harmed. The defendants deny that their actions were any of these things and deny that the plaintiffs were harmed.

[Additional; these descriptions are not agreed on and are simply for the Court's convenience.]

Description of the parties to the case:

A. The Plaintiffs [proposed by the plaintiffs]

The plaintiffs in this case are:

- Robbie Parker, the father of first-grader Emilie Parker. Emilie was killed in the Sandy Hook Elementary School shooting on December 14, 2012.
- David Wheeler and Francine Wheeler, the parents of first-grader Benjamin Wheeler. Benjamin was killed in the Sandy Hook Elementary School shooting on December 14, 2012.
- Mark and Jackie Barden, the parents of first-grader Daniel Barden. Daniel was killed in the Sandy Hook Elementary School shooting on December 14, 2012.
- Nicole Hockley and Ian Hockley, the parents of first-grader Dylan Hockley. Dylan was killed in the Sandy Hook Elementary School shooting on December 14, 2012.
- Jennifer Hensel, the mother of first-grader Avielle Richman. Avielle was killed in the Sandy Hook Elementary School shooting on December 14, 2012.
- Donna Soto is the mother, and Carlee Soto Parisi, Mathew Soto, and Jillian Soto-Marino are the siblings, of first-grade teacher Victoria Leigh Soto. Vicki was killed in the Sandy Hook Elementary School shooting on December 14, 2012.
- Bill Sherlach was the spouse of Mary Sherlach, the school psychologist. Mary was killed in the Sandy Hook Elementary School shooting on December 14, 2012.
- Erica Lafferty, through her bankruptcy trustee, Rich Coan. Erica's mother, elementary school principal Dawn Hochsprung, was killed in the Sandy Hook Elementary School shooting on December 14, 2012.
- Bill Aldenberg. Bill Aldenberg was a first responder to Sandy Hook Elementary School on December 14, 2012.

B. The Defendants [proposed by the defendants]

Mr. Jones resides in, and Free Speech Systems is located in, Austin, Texas.

III. LIST OF ALL WITNESSES REASONABLY EXPECTED TO BE CALLED BY EACH PARTY

A. Plaintiffs' Witnesses

At this time, the plaintiffs reasonably expect to call the following witnesses to testify. This list does not reflect the order in which these witnesses will be called, as that order has not yet been determined at this time and will likely depend on witness availability. Further, to the extent that plaintiffs' counsel is aware of any special scheduling problems at this time, we have so indicated.

1. Alex Emric Jones (Defendant)
2. Brittany Paz (Defendant Free Speech Systems, LLC's Corporate Designee)
3. Erica Lafferty
4. Robert Parker (Plaintiff)
5. Nicole Hockley (Plaintiff)
6. Ian Hockley (Plaintiff)
7. David Wheeler (Plaintiff)
8. Francine Wheeler (Plaintiff)
9. William Sherlach (Plaintiff)
10. Mark Barden (Plaintiff)
11. Jackie Barden (Plaintiff)
12. Donna Soto (Plaintiff)
13. Jillian Soto-Marino (Plaintiff)
14. Carlee Soto Parisi (Plaintiff)
15. Mathew Soto (Plaintiff)
16. Jennifer Hensel (Plaintiff)
17. William Aldenberg (Plaintiff)
18. Richard Coan (Plaintiff and trustee of the Bankruptcy Estate of Erica Garbatini, fka Erica Lafferty)
19. Monte Frank (Eyewitness)
20. Ryan Graney (Eyewitness)
21. Stephen Sedensky (Eyewitness)
22. Heidi Beirich (Plaintiffs' Expert)
23. Steven Brill (Plaintiffs' Expert)
24. Anthony Campanelli (Plaintiffs' Expert)
25. Joshua Rockoff (Plaintiffs' Expert)
26. Oren Segal (Plaintiffs' Expert)
27. Paul Steiger (Plaintiffs' Expert)
28. Clint Watts (Plaintiffs' Expert)
29. Gary Krantz (Plaintiffs' Expert)
30. Attorneys' Fees Expert (Under discussion between the parties)

B. Defendants' Witnesses

1. Alex Jones. Primary defendant and owner of Free Speech Systems.
2. Brittany Paz. Corporate Representative, Free Speech Systems.
3. Robert Roe. Accountant and consultant to Free Speech Systems (potential rebuttal only; unavailable until September 30, 2022.)
4. Daria Karpova. Employee of Free Speech Systems
5. Michael Zimmerman. Former employee of Free Speech Systems

6. Blake Roddy. Employee of Free Speech Systems.
7. Robert Dew. Former employee of Free Speech Systems.
8. Melinda Flores. Employee of Free Speech Systems.

IV. LIST OF ALL DEPOSITIONS THAT WILL BE SUBMITTED INTO EVIDENCE

A. Plaintiffs' Response

The plaintiffs intend to offer in evidence, in whole or in part, the deposition transcripts set forth below. See Affidavit of Chris Mattei, attached hereto. As to defendant Alex Jones and Ms. Brittany Paz, the corporate designee of Free Speech Systems, LLC, the plaintiffs intend to offer their deposition transcripts at trial as listed below, but not in lieu of their live testimony. Mr. Jones is under subpoena and the plaintiffs have alerted defendants' counsel that they will give dates on which Mr. Jones is requested to testify.

1. Alex Jones
 - a. April 5, 2022, April 6, 2022, and June 21, 2022 (Connecticut)
 - b. March 14, 2019, November 26, 2019, and December 4, 2021 (Texas)
2. Brittany Paz
 - a. February 14, 2022 (Texas)
 - b. February 15, 2022 (Texas)
 - c. March 15, 2022 (Connecticut)
 - d. March 16, 2022 (Connecticut)
 - e. June 27, 2022 (Connecticut)
3. Jacob Nico Acosta
4. Ted Anderson
5. Daniel Bidondi
6. Christopher Daniels
 - a. November 10, 2021 and June 9, 2022 (Connecticut)
 - b. February 17, 2022 (Texas)
7. Robert Dew
 - a. May 16, 2019 and June 14, 2022 (Connecticut)
8. Melinda Flores
9. Timothy Fruge
 - a. May 15, 2019 and January 14, 2022
10. John Haarmann
11. Robert Jacobson
12. David Jones

13. Daria Karpova
14. Kurt Nimmo
15. Josh Owens
16. Blake Roddy
17. Adan Salazar
18. Louis Serrtuche
19. Owen Shroyer
 - a. November 4, 2021 and June 8, 2022 (Connecticut)
 - b. December 2, 2021 (Texas)
20. Paul Watson
21. Lydia Zapata-Hernandez

The plaintiffs also intend to offer in evidence, in whole or in part, the deposition transcripts of the following corporate representatives in lieu of their live testimony.

22. Free Speech Systems, LLC
 - a. Michael Zimmerman (Connecticut)
 - b. Robert Dew
 - i. March 15, 2019 (Texas)
 - ii. November 26, 2019 (Texas)
 - c. Daria Karpova (Texas)
 - d. Michael Zimmerman (Texas)
23. Infowars, LLC a. Michael Zimmerman (Connecticut)
 - a. Robert Dew (Texas)
24. Infowars Health, LLC
 - a. Michael Zimmerman
25. Prison Planet TV, LLC
 - a. Michael Zimmerman
26. Genesis Communications Network, Inc.
 - a. Ted Anderson
27. Sprout Social, Inc.
 - a. Matthew Trumbell

B. Defendants

None, although the defendants reserve the right to use deposition transcripts of plaintiffs and experts deposed for any impeachment, if necessary.

V. JOINT LIST OF PENDING MOTIONS, PENDING REQUESTS FOR DISCOVERY, AND MOTIONS IN LIMINE

PLAINTIFFS' RESPONSE:

The following motions are pending in this case:

1. DN 863:00, 7/6/22: Attorney Federico Andino Reynal's Motion for Permission to Appear Pro Hac Vice
2. DN 864.00, 7/11/22: Plaintiffs' Request to Bring Items Into the Courthouse
3. DN 867.00, 7/12/22: Defendants' Motion for Reconsideration Re: Request to Continue Trial Dates
4. DN 868.00, 7/12/22: Defendant Alex Emric Jones' Motion to Quash or Modify Subpoena Ad Testificandum

The following requests for discovery are pending in this case:

1. The Jones defendants have agreed to produce certain materials on behalf of Brittany Paz, the corporate representative of Free Speech Systems, LLC. These materials were referenced during her deposition on June 27, 2022 in Connecticut but had not been previously produced: (1) two audio files of voicemails from Alex Jones to Brittany Paz and (2) the Google Analytics spreadsheet Blake Roddy showed to Brittany Paz in preparation for her deposition. As of the writing of this report, these materials have not yet been produced.
2. The deposition of Alex Jones is still open. The defendants have agreed to produce Mr. Jones on July 21 to complete his deposition.
3. Subpoenas to Facebook and Twitter are still pending. The plaintiffs anticipate compliance from Facebook will be produced this week.

A. Plaintiffs

The plaintiffs intend to file the following motions in limine:

1. Motion In Limine Precluding Evidence Regarding the Basis for the Court's Default Ruling, Argument Against the Default Ruling, and Evidence and Argument Ignoring the Court's Ruling Striking the Jones Defendants' Notice of Defenses
2. Motion In Limine for Preliminary Charge to Jury on Default
3. Motion In Limine Precluding Questioning, Evidence, or Argument on the *Soto v. Bushmaster* Case
4. Motion in Limine to Preclude Evidence and Argument Regarding Resolutions with Former Defendants
5. Motion in Limine to Preclude Inappropriate Questioning and Argument Regarding the Plaintiffs' Lawyers and Their Firm

Additional motions being filed:

1. Motion in Limine to Preclude Inappropriate Questioning and Argument Regarding the Plaintiffs' Lawyers and Their Firm

DEFENDANTS' RESPONSE:

B. Defendants

Motions

1. Motion in Limine to Preclude Dr. Beirich: The motion will assert that she lacks qualifications to testify as an expert. The motion is being prepared by Attorney Mark Rademacher. Mr. Rademacher was admitted to the hospital on an emergency basis on July 1, 2022 and is expected to be hospitalized for two days. The defendants request an extension of time until July 18, 2022 to file this motion. The plaintiffs do not object to this extension.
2. Objection to scheduling of trial. The court's decision to hold the parties to a scheduling order entered prior to when proceedings were stayed as a result of a bankruptcy filing has resulted in Mr. Jones and FSS needing to appear simultaneously in Texas for a Sandy Hook trial and in Connecticut for a Sandy Hook trial. Mr. Jones and FSS request an adjournment of the proceedings for one month, such that jury selection will begin after Labor Day. (A pleading will be filed with motions in limine to preserve this claim.)
3. Motion in Limine for permission to introduce decision entering a liability default judgment. The defendants seek introduction of this to demonstrate that the Court made this ruling for reasons of discovery non-compliance and not because of the underlying merits of the plaintiffs' various claims. (A motion in limine will be filed to support this claim.)
4. Motion to Quash Subpoena of Alex Jones as untimely served. (The motion will be filed with the motions in limine.)
5. Motion to Preclude Testimony of Experts re "Far-Right Extremism and White Supremacy" as unduly prejudicial and outside the scope of the pleadings.
6. Pro hoc vice admission of Attorney Reyal.

Discovery

The plaintiffs have noticed eight depositions and the times at which those experts are available. Depositions are proceeding apace and shall continue in August. The expert disclosures were delayed do to the automatic stay incident to a bankruptcy filing. The defense urges the Court to consider a 30-day delay in commencement of proceedings to avoid the need to take depositions during jury selection.

VI. BRIEF DESCRIPTION OF ISSUES OF LAW THAT MAY ARISE DURING TRIAL, INCLUDING EVIDENTIARY ISSUES

A. The plaintiffs anticipate that the following issues will arise at trial:

The parties have stipulated to the authenticity of all videos and documents produced by the defendants in this case, as well as to the authentication by affidavit of certain other evidence.

Because of the number of videotaped depositions that will be used, the plaintiffs anticipate seeking the Court's leave to play excerpts of some depositions thematically, rather than playing them witness by witness. The plaintiffs' counsel will meet and confer with the defendants' counsel on this issue.

The plaintiffs anticipate that the trial will focus on the extent of the wrongdoing of Alex Jones and Free Speech Systems, including the willful, malicious and intentional nature of their statements and conduct; the reprehensibility of their conduct; the outrageousness of their conduct; and the extent their conduct was motivated by greed. *E.g. Lydall, Inc. v. Ruschmeyer*, 282 Conn. 209, 245 (2007) (basis for punitive damages "has been repeatedly described in terms of wanton and malicious injury, evil motive and violence...." also "outrageous conduct," and "acts done with a bad motive or with a reckless indifference to the interests of others."); *Ulbrich v. Groth*, 310 Conn. 375, 454-56 (2013) (in context of CUTPA punitives, factors include whether the defendant's "[a]ction [was] taken or omitted in order to augment profit"; deterring defendant and others from future similar conduct; and the "degree of reprehensibility of the defendant's misconduct"); *Comm'n on Hum. Rts. & Opportunities ex rel. Arnold v. Forvil*, 302 Conn. 263, 286 (2011) (humiliation and emotional distress established by testimony or inferred from the circumstances); *Carrol v. Allstate Ins. Co.*, 262 Conn. 433, 450 (2003) (defendant's motivations and outrageousness of defendant's conduct relevant to jury's determination of emotional distress damages); 1 Restatement (Second) Torts § 46, cmt (j) ("in many cases the extreme and

outrageous character of the defendant's conduct is in itself important evidence that the distress has existed”). Under these authorities, Free Speech Systems, LLC’s profits and Alex Jones’s compensation are relevant for the jury’s consideration. *See Ulbrich*, 310 Conn. at 454-56. Alex Jones’s actions in transferring assets out of Free Speech Systems is also relevant as evidence of consciousness of guilt. *See State v. Cocomo*, 302 Conn. 664, 671-72 (2011); *Batick v. Seymour*, 186 Conn. 632, 637-38 (1982).

The plaintiffs anticipate that the defendants may attempt to relitigate the default in various ways, including by attacks by Mr. Jones on the Court and counsel, and by argument that the default violates the First Amendment. The default ruling and ruling striking the Jones defendants’ Notice of Defenses resolve liability, including challenges to liability made under the First Amendment, in favor of the plaintiffs and against the defendants. *See, e.g. Smith v. Snyder*, 267 Conn. 456, 471 (2004) (effect of default is “the conclusive establishment of liability”; *Marcus v. DuPerry*, 223 Conn. 484, 488 (1992) (“the defendant’s liability has already been conclusively established by the rendering of the default”).

B. Defendants

1. Based on the discovery to date, the plaintiffs have no ascertainable economic loss as to the CUTPA claim, and whether this claim presents an issue for a jury to decide on damages is questionable. *Herron v. Daniels*, 208 Conn. App. 75, 100 (2021); *Kelly v. Kurtz*, 193 Conn. App. 507, 536-37 (2019).
2. Notwithstanding the liability default, the plaintiffs have not alleged, nor attempted to prove, any deceptive trade practice or any unscrupulous or immoral conduct regarding a particular product or service. Rather, they contend that the defendants’ speech, to wit, their “conspiracy theories,” are “lies” used to attract listeners and thereby draw customers to products. Using the CUTPA to attack such general speech runs afoul of the limitations on CUTPA claims examined in *Caldor, Inc., v. Heslin*, 215 Conn. 590, 600 (1990). Whether the non-commercial political speech, or otherwise non-commercial tortious speech alleged can support causation under CUTPA appears to be an issue of first impression in Connecticut.

3. Despite the liability default, the plaintiffs are still required to prove causation. In the absent of competent proof of causation the plaintiffs should be entitled to no more than nominal damages. *Right v. Breen*, 88 Conn. App. 583, 588-89 (2005).
4. In the absence of either ascertainable economic loss or compensatory damages in excess of a nominal sum, the plaintiffs are not entitled to an award of punitive damages greater than the nominal sum. *Exxon Shipping Co. v. Baker*, 554 U.S. 471, 514 (2008); *State Farm Mut. Auto Ins., v. Campbell*, 538 U.S. 408, 425 (2003).

THE PLAINTIFFS

By /s/ Christopher M. Mattei
CHRISTOPHER M. MATTEI
ALINOR C. STERLING
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CERTIFICATION

I certify that a copy of the above was or will immediately be mailed or delivered electronically or nonelectronically on this date to all counsel and self-represented parties of record and that written consent for electronic delivery was received from all counsel and self-represented parties of record who were or will immediately be electronically served.

For Alex Emric Jones and Free Speech Systems, LLC:

Norman A. Pattis, Esq.
Cameron L. Atkinson, Esq.
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/s/ Christopher M. Mattei

**ALINOR C. STERLING
CHRISTOPHER M. MATTEI
MATTHEW S. BLUMENTHAL**

TAB A

NO. X06-UWY-CV-18-6046436-S : SUPERIOR COURT
ERICA LAFFERTY, ET AL. : COMPLEX LITIGATION DOCKET
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**AFFIDAVIT REGARDING THE PARTIES' MEET AND CONFER
CONCERNING OBJECTIONS LODGED DURING DEPOSITION TESTIMONY**

I, Christopher M. Mattei, hereby depose and state that:

1. I am over the age of 18 and believe in the sanctity of an oath.
2. I make this Affidavit upon my own personal knowledge, information and belief.
3. I am counsel for the plaintiffs in the above-entitled matter.
4. Pursuant to the Court's Trial Preparation Order (DN 836.00), counsel were required to "confer before the TMC as to any objections to questions or requests for redaction of deposition testimony" that will be submitted in lieu of live testimony.
5. On July 11, 2022, at approximately 11:00 a.m., Attorneys Mattei and Sterling (plaintiffs' counsel) and Attorney Pattis (counsel for the Jones defendants) met via teleconference for

the purpose of complying with the Court's directive that the parties meet and confer concerning objections and requests for redaction that were made during deposition testimony, which may be offered in lieu of live testimony at trial.

6. On July 6, 2022, Attorney Mattei sent Attorney Pattis a letter listing the transcripts that the plaintiffs intended to offer in evidence at trial. *See* Ex. A. Attorney Mattei asked Attorney Pattis to identify those objections lodged during the relevant depositions that Attorney Pattis intended to pursue so that counsel could meet and confer in accordance with the Court's order. In a subsequent email exchange, Attorney Pattis took the position that he would not identify any such objections unless the plaintiffs first excerpted on a line-by-line basis the deposition testimony that they intended to offer. Attorney Mattei responded that the Court's order did not require line-by-line designations at this time and suggested that Attorney Pattis and his team begin the process of reviewing their objections. Attorney Pattis asked to discuss the matter. Attorney Mattei agreed and advised that he would be available to meet that afternoon. Attorney Pattis did not respond.
7. On July 8, 2022, Attorney Mattei advised Attorney Pattis via email that although the Court did not order line-by-line designations at this time, Attorney Mattei would begin sending specific, line-by-line deposition designations on a rolling basis in order to "mov[e] things along" and to facilitate the resolution of issues. In the same email, Attorney Mattei asked to meet and confer concerning objections to these designations on July 10 or July 11. Attorney Pattis requested to meet on July 11 at 11:00 a.m, and Attorney Mattei agreed.
8. On July 10, 2022, Attorney Mattei sent 11 depositions to Attorney Pattis with line-by-line designations.
9. On July 10, 2022 at 8:07 p.m., Attorney Mattei sent an email to Attorney Pattis clarifying that although the plaintiffs intend to offer the deposition testimony of Alex Jones and Brittany Paz at trial, they do not intend to do so in lieu of live testimony. Rather, the plaintiffs expect to call Alex Jones, who has been subpoenaed, and Brittany Paz to testify live at trial.
10. During the teleconference on July 11, Attorney Pattis stated that he had not identified any objections to any of the deposition testimony set forth in the transcripts listed by the plaintiffs, including the 11 depositions that contained specific line-by-line designations. Attorney Pattis stated that he would propose to the Court that the Jones defendants identify any such objections within 10 days of receiving all of the plaintiffs' line-by-line designations. Attorney Mattei advised that he believed the plaintiffs had complied with their obligations and did not agree that the Court's Pre-Trial Preparation Order should be modified. Attorney Pattis also stated that the Jones defendants would not be offering any deposition testimony in lieu of live testimony.

11. After discussing other trial related matters, counsel concluded the teleconference at approximately 11:35 a.m.

A handwritten signature in blue ink, appearing to read "Christopher M. Mattei". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Christopher M. Mattei
Commissioner of the Superior Court

EXHIBIT A



KOSKOFF KOSKOFF & BIEDER PC

July 6, 2022

Norman Pattis, Esq. (via email)
Cameron Atkinson, Esq. (via email)
Pattis & Smith LLC
383 Orange Street, First Floor
New Haven, CT 06511
npattis@pattisandsmith.com
catkinson@pattisandsmith.com

Re: Erica Lafferty et al. v. Alex Emric Jones, et al., and consolidated matters

Counsel,

In advance of the Trial Management Conference scheduled for July 14, 2022, please be advised that the plaintiffs may offer in evidence, in whole or in part, the deposition transcripts of the following witnesses in lieu of their live testimony at trial. If a witness sat for separate depositions (as opposed to multiple dates) or if the deposition testimony was given in related litigation in Texas, we have so indicated.

1. Jacob Nico Acosta
2. Ted Anderson
3. Daniel Bidondi
4. Christopher Daniels
 - a. November 10, 2021 and June 9, 2022 (Connecticut)
 - b. February 17, 2022 (Texas)
5. Robert Dew
 - a. May 16, 2019 and June 14, 2022 (Connecticut)
6. Melinda Flores
7. Timothy Fruge
 - a. May 15, 2019 and January 14, 2022
8. John Haarmann
9. Robert Jacobson
10. Alex Jones
 - a. April 5, 2022, April 6, 2022, and June 21, 2022 (Connecticut)
 - b. March 14, 2019, November 26, 2019, and December 4, 2021 (Texas)
11. David Jones



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12. Daria Karpova
13. Kurt Nimmo
14. Josh Owens
15. Blake Roddy
16. Adan Salazar
17. Louis Serrtuche
18. Owen Shroyer
 - a. November 4, 2021 and June 8, 2022 (Connecticut)
 - b. December 2, 2021 (Texas)
19. Paul Watson
20. Lydia Zapata-Hernandez

In addition, the plaintiffs may offer in evidence, in whole or in part, the deposition transcripts of the following corporate representatives.

21. Free Speech Systems, LLC
 - a. Brittany Paz (Connecticut)
 - b. Michael Zimmerman (Connecticut)
 - c. Robert Dew
 - i. March 15, 2019 (Texas)
 - ii. November 26, 2019 (Texas)
 - d. Daria Karpova (Texas)
 - e. Brittany Paz
 - i. February 14, 2022 (Texas)
 - ii. February 15, 2022 (Texas)
 - f. Michael Zimmerman (Texas)
22. Infowars, LLC
 - a. Michael Zimmerman (Connecticut)
 - b. Robert Dew (Texas)
23. Infowars Health, LLC
 - a. Michael Zimmerman
24. Prison Planet TV, LLC
 - a. Michael Zimmerman
25. Genesis Communications Network, Inc.
 - a. Ted Anderson

26. Sprout Social, Inc.
a. Matthew Trumbell

Pursuant to the Court's Trial Preparation Order, the parties are required to meet and confer concerning any objections to questions or requests for redactions to deposition testimony. Therefore, please identify any such objections or requests in which you intend to persist, and provide dates on which you are available to meet and confer regarding the same.

Respectfully yours,

A handwritten signature in blue ink, appearing to read "Christopher M. Mattei", with a long horizontal flourish extending to the right.

Christopher M. Mattei, Esq.